

July 15, 2019

VIA ECF

Hon. Therese W. Dancks
United States Magistrate Judge
Federal Building and U.S. Courthouse
P.O. Box 7346
Syracuse, New York 13261

**Re: United States v. Waterbury, et al.
Civil Action No. 5:18-cv-440 (MAD/TWD)**

Dear Judge Dancks:

Pursuant to the Court's Order of July 9, 2019, Defendants write to provide a status update on settlement of the above-referenced matter.

At this time, the parties have finished their negotiations concerning the written Consent Decree. Counsel for the United States, Lori Wagner, was to provide my office with a copy of the Consent Decree for final review today. Ms. Wagner and her colleagues are moving offices today, and through no fault of their own, are having technological difficulties getting that draft to our office. It is both parties hope the Consent Decree will be in our possession later today, or early tomorrow morning at the latest.

Once we have the final version of the Consent Decree in our possession, we will review with Defendants. As the Court is aware, the Department of Justice must also approve the final version of the Consent Decree before the parties can submit it to the Court for review.

The parties are hopeful to obtain final approval of the Consent Decree this week. Therefore, the parties jointly request that they be permitted to submit a status update, or the proposed Consent Decree, to the Court by July 22, 2019.

Please send mail to our scanning center at: PO Box 1057, Buffalo, NY 14201

Very truly yours,

GOLDBERG SEGALLA LLP

John P. Coghlan

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JPC:

cc: All Counsel, via ECF